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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of

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| Amendment of Section 73.202(b) |) | |
| Table of Allotments |) | MB Docket No. 05-17 |
| FM Broadcast Stations |) | RM-11113 |
| (Connersville, Madison, and Richmond, |) | RM-11114 |
| Indiana, Erlanger, Lebanon, Lebanon Junction, |) | |
| New Haven, and Springfield, Kentucky, |) | |
| and Norwood, Ohio) |) | |

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APR - 5 2005

Federal Communications Commission
Office of Secretary

To: Office of the Secretary
Attn: Assistant Chief, Media Bureau

REPLY TO BLUE CHIP BROADCASTING LICENSES II, LTD.

Rodgers Broadcasting Corporation ("RBC"), licensee of Station WIFE(FM), Connersville, Indiana, by its counsel, replies to the "Response to Order to Show Cause" filed by Blue Chip Broadcasting Licenses II, Ltd. ("Blue Chip") in the above-captioned proceeding. Blue Chip fails to demonstrate why the proposed modification of Station WIZF is not in the public interest.

1. RBC's petition requested a change in the community of license of WIFE from Connersville to Norwood, Ohio. In order to accomplish that change, RBC requested several other allotment changes, including the substitution of Channel 266A for 265A at Erlanger, Kentucky and the modification of the license of WIZF to reflect the change. The Commission issued an Order to Show Cause to Blue Chip looking towards the channel change.

2. Blue Chip argues that the Order to Show Cause inadequately considers the "displacement and confusion" that will result from the proposed channel change. This argument is premature, because no reimbursement amount has yet been suggested by Blue Chip and no discussions have yet taken place between the parties. Blue Chip frames its argument as a

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challenge to *Circleville*, but such a challenge is unripe because it has not been shown that *Circleville* principles fail to compensate Blue Chip adequately in this case.

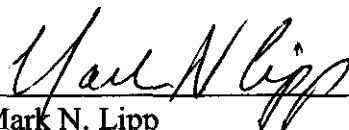
3. Moreover, the identical argument Blue Chip makes here has been addressed many times by the Commission and rejected each time. The Commission has acknowledged that a channel change may disrupt existing listening patterns, but it has repeatedly held that any such disruption is not sufficient to overcome the public interest in an additional service. *See Smith and Reno, Nevada*, 12 FCC Rcd 10218 (1997); *Ava, Branson and Mountain Grove, Missouri*, 10 FCC Rcd 13035 (1995).

4. Although Blue Chip argues that the listener confusion will be greater because of the size of its market, in fact the opposite is true because of the minimal frequency displacement. The proposed channel is only one channel away from Station WIZF's current channel, which should cause virtually no listener confusion. The station's signal on its new frequency will likely be audible when radios are tuned to the old frequency, and a tuning adjustment will naturally be made.

WHEREFORE, for the foregoing reasons, the Commission should substitute Channel 266A for Channel 265A at Erlanger, Kentucky and modify the license of WIZF as proposed.

Respectfully Submitted,

RODGERS BROADCASTING CORPORATION

By: 

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April 5, 2005

CERTIFICATE OF SERVICE


I, Andrea Brown, of the law firm of Vinson & Elkins, do hereby certify that on this 5th day of April, 2005, I caused a copy of the foregoing "Reply to Blue Chip Broadcasting Licenses II, Ltd." to be sent via first-class mail, postage prepaid, to the following:

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